

# WILKERSON ♦ BRYAN

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February 27, 2009

## **Via Electronic Comment Filing System**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

**Re: Castleberry Telephone Company, Inc.'s Annual 47 C.F.R. § 64.2009(e)  
Customer Proprietary Network Information (CPNI) Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Castleberry Telephone Company, Inc. ("Castleberry"), please find attached the annual CPNI Compliance Certification ("Certification") for Castleberry for the year 2008 in EB Docket No. 06-36, which has been filed electronically via the Federal Communication Commission's ("Commission") Electronic Comment Filing System on this date. Simultaneously, Castleberry has also provided one (1) copy of the Certification to Best Copy and Printing, Inc., via electronic mail at [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM), as required under the Commission's Public Notice, DA 09-9 (released January 7, 2009).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.



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Enclosure

cc: Homer Holland  
Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of company covered by this certification: Castleberry Telephone Company, Inc.

Form 499 Filer ID: 805914

Name of signatory: Homer Holland

Title of signatory: Secretary/Treasurer

In response to the Commission's Public Notice, DA 09-9 (released January 7, 2009), Castleberry Telephone Company, Inc. states as follows:

I, Homer Holland, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, as set forth in 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

Signed Homer Holland

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT  
OF  
CASTLEBERRY TELEPHONE COMPANY, INC.**

**EB Docket No. 06-36**

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of Castleberry Telephone Company, Inc. (hereinafter "Castleberry") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001 *et seq.* on behalf of Castleberry:

1. I have personal knowledge that Castleberry has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
2. I have personal knowledge that Castleberry obtains written approval for the use of its customers' CPNI and that Castleberry has notified its customers of their right to restrict Castleberry's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
3. I have personal knowledge that Castleberry has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001 *et seq.* and that Castleberry has an express disciplinary process in place to deal with breaches of CPNI.
4. I have personal knowledge that Castleberry implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
5. I have personal knowledge that Castleberry maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. Castleberry retains all such records for a minimum period of one (1) year.
6. I have personal knowledge that Castleberry has established a supervisory review process regarding Castleberry's compliance with outbound marketing situations and that

Castleberry maintains records of such compliance for a minimum period of one (1) year. Castleberry's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

7. I have personal knowledge that Castleberry has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this 19<sup>th</sup> day of February, 2009.

CASTLEBERRY TELEPHONE COMPANY, INC.

By: Homer Holland  
Homer Holland  
Secretary/Treasurer